

MAY 24 2023

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. ) No. S1-4:22-CR-00721 SRC SRW  
 )  
 ALEXANDRIA COLLINS )  
 AND ONEASHA STEVENSON, )  
 Defendants. )

**SUPERSEDING INDICTMENT**

The Grand Jury charges:

**COUNT 1**

(Conspiracy to Defraud)

**A. Conspiracy**

1. Beginning on or about January 14, 2022 and continuing through on or about December 6, 2022, in the Eastern District of Missouri and elsewhere, the defendants,

**ALEXANDRIA COLLINS  
AND  
ONEASHA STEVENSON,**

and persons known and unknown to the Grand Jury did unlawfully, willfully, and knowingly combine, conspire, and agree with persons known and unknown to the grand jury to commit the following offenses against the United States:

- a. to use interstate wires to execute a scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1343;
- b. to possess, transfer, and use, without lawful authority, a means of identification of another individual with the intent to commit, and in connection to a violation of Federal

law and that constitutes a felony under the laws of the States of Missouri and Illinois, in violation of Title 18, United States Code, Section 1028(a)(7);

- c. to transfer, possess, or use the means of identification of another, without lawful authority, during and in relation to, a specified enumerated offense, in violation of Title 18, United States Code, Section 1028A;
- d. to falsify, conceal, and cover up by a scheme a material fact, in violation of Title 18, United States Code, Section 1001(a)(1);
- e. to make a materially false, fictitious, and fraudulent statement and representation, in violation to Title 18, United States Code, Section 1001(a)(2); and
- f. to make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, in violation to Title 18, United States Code, Section 1001(a)(3).

B. **Object of the Conspiracy**

2. The object of the conspiracy was for the defendants, **ALEXANDRIA COLLINS**, **ONEASHA STEVENSON**, R.J., and persons known and unknown to the Grand Jury to achieve a common goal, that is: to assist defendant **ALEXANDRIA COLLINS** in evading the supervision of the United States Probation Office of the Eastern District of Missouri and to avoid paying restitution as ordered in *United States v. Alexandria Collins*, Criminal Case Number 4:18CR00811 SRC.

C. **OVERT ACTS**

3. In furtherance of and to effect the objects of the conspiracy, one or more of the co-conspirators committed and caused to be committed one or more of the following overt acts

in the Eastern District of Missouri and elsewhere;

- a. As verification of her employment with Saint Louis Live Trucking LLC and her income, between on or about January 14, 2022 and on or about July 1, 2022, Defendant **ALEXANDRIA COLLINS** submitted counterfeit paystubs to representatives of the United States Probation Office for the Eastern District of Missouri;
- b. On or about May 23, 2022, Exotic Escape Rental Sales and A.S. transmitted through interstate wires \$15,000 to Defendant **ALEXANDRIA COLLINS** at Neighbors Credit Union that Defendant **ALEXANDRIA COLLINS** failed to report to the United States Probation Office for the Eastern District of Missouri;
- c. On or about July 7, 2022, Defendant **ALEXANDRIA COLLINS** failed to report to the United States Probation Office for the Eastern District of Missouri the depositing of a cashier's check drawn in the amount of \$27,800 and made payable to Defendant **ALEXANDRIA COLLINS** re: Exotic Escape Rental Sales into a Neighbors Credit Union account;
- d. On or about July 8, 2022, Exotic Escape Rental Sales and A.S. transmitted through interstate wires \$9,000 to Defendant **ALEXANDRIA COLLINS** at Neighbors Credit Union that Defendant **ALEXANDRIA COLLINS** failed to report to the United States Probation Office for the Eastern District of Missouri;
- e. On or about August 20, 2022, R.J. opened a student checking account with US Bank in the Eastern District of Missouri;

- f. Between on or about August 20, 2022 and September 14, 2022, R.J. provided Defendant **ALEXANDRIA COLLINS** with the U.S. Bank debit card issued to R.J.'s student checking account;
- g. On or about September 6, 2022, using interstate wires, Defendant **ALEXANDRIA COLLINS** and Defendant **ONEASHA STEVENSON** electronically transmitted a fraudulent application and counterfeit supporting documents relative to a lease for a home located in Shiloh, Illinois;
- h. On or about September 8, 2022, Defendant **ALEXANDRIA COLLINS** and Defendant **ONEASHA STEVENSON** executed a residential lease agreement for the Shiloh residence that falsely claimed that Defendant **ONEASHA STEVENSON**, F.S., and K.S. would reside in the home, and that Defendant **ONEASHA STEVENSON** would be responsible for the rent of \$3,035 per month;
- i. On or about September 14, 2022, a person unknown to the Grand Jury deposited into the student checking account of R.J. \$1,900 cash using R.J.'s debit card and an ATM located in St. Charles County, Missouri;
- j. On or about September 14, 2022, using the customer identification for Defendant **ONEASHA STEVENSON**, a person unknown to the Grand Jury electronically transmitted through interstate wires \$1,240 from the student checking account of R.J. to Home Partners Holdings, LLC as the pro-rated rent for the Shiloh, Illinois residence;
- k. On or about September 19, 2022, Defendant **ALEXANDRIA COLLINS**, A.C., and M.C. moved from St. Charles County, Missouri into the Shiloh, Illinois residence rented in the identity of Defendant **ONEASHA STEVENSON**;

- l. Between on or about October 3, 2022 and December 5, 2022, Defendant **ALEXANDRIA COLLINS** deposited more than \$8,800 cash into the student checking account of R.J. using R.J.'s debit card and an ATM located in O'Fallon, Illinois;
- m. Between on or about October 3, 2022 and December 5, 2022, using the customer identification for Defendant **ONEASHA STEVENSON**, a person unknown to the Grand Jury electronically transmitted through interstate wires more than \$9,000 from the student checking account of R.J. to Home Partners Holdings, LLC as rent for the Shiloh, Illinois residence;
- n. On or about October 17, 2022, Defendant **ALEXANDRIA COLLINS** texted an image of a counterfeit lease to a representative of the United States Probation Office that falsely claimed that the Shiloh, Illinois residence rented in the identity of Defendant **ONEASHA STEVENSON** had been rented by L.C. and R.T. on behalf of themselves, Defendant **ALEXANDRIA COLLINS**, L.C., M.C., and A.C.; and,
- o. Between September 19, 2022 and December 22, 2022, Defendant **ALEXANDRIA COLLINS** concealed from the United States Probation Office that she was residing with a convicted felon in the Shiloh, Illinois residence.

In violation of Title 18, United States Code, Section 371.

**COUNT 2**

(Making a False Statement)

On or about July 1, 2022, in the Eastern District of Missouri, the defendant,

**ALEXANDRIA COLLINS**,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the

jurisdiction of the United States Probation Office, an agency of the judicial branch of the United States, by submitting to a United States Probation Officer in the Eastern District of Missouri a counterfeit pay stub representing that she was a wage employee of St. Louis Live Trucking LLC, when in fact, St. Louis Live Trucking LLC did not report her employment to the Missouri Department of Employment Security, and is not registered as a business in Missouri.

In violation of Title 18, United States Code, Sections 1001(a)(3) and 2.

**COUNT 3**

(Aggravated Identity Theft)

On or about September 6, 2022, in the Eastern District of Missouri, the defendants,

**ONEASHA STEVENSON  
AND  
ALEXANDRIA COLLINS,**

did knowingly possess, transfer, and use, without lawful authority, a means of identification, that being, the name, date of birth, and social security number of **ONEASHA STEVENSON**, during and in relation to the commission of the felony offenses of wire fraud, Title 18, United States Code, Section 1343, and making false statements, Title 18, United States Code, Section 1001.

In violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 4**

(Making a False Statement)

On or about October 17, 2022, in the Eastern District of Missouri, the defendants,

**ONEASHA STEVENSON  
AND  
ALEXANDRIA COLLINS,**

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the United States Probation Office, an agency of the judicial branch of the United States, by submitting to a United States Probation Officer in the Eastern District of Missouri a false and counterfeit lease application listing herself as an approved occupant of a residence in Illinois, when in fact, the defendant had fraudulently rented the residence using the name and identifying information of **ONEASHA STEVENSON**.

In violation of Title 18, United States Code, Sections 1001(a)(3) and 2.

**COUNT 5**

(Aggravated Identity Theft)

On or about December 10, 2022, in the Eastern District of Missouri, the defendant,

**ONEASHA STEVENSON,**

did knowingly possess, transfer, and use, without lawful authority, the means of identification of another person, to wit, the name, date of birth, and social security number of D.T., during and in relation to the commission of the felony offenses of access device fraud, Title 18, United States Code, Section 1029(a)(2) and social security fraud, Title 42, United States Code, Section 408(a)(7)(B), to make purchases at Best Buy in Brentwood, Missouri, knowing that the means of identification belonged to an actual person.

In violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 6**

(Aggravated Identity Theft)

On or about December 10, 2022, in the Eastern District of Missouri, the defendant,

**ONEASHA STEVENSON,**

did knowingly possess, transfer, and use, without lawful authority, the means of identification of another person, to wit, the name, date of birth, and social security number of D.T., during and in relation to the commission of the felony offenses of access device fraud, Title 18, United States Code, Section 1029(a)(2) and social security fraud, Title 42, United States Code, Section 408(a)(7)(B), to make purchases at Best Buy in Bridgeton, Missouri, knowing that the means of identification belonged to an actual person.

In violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 7**

(Access Device Fraud)

On or about December 10, 2022, within the Eastern District of Missouri, the defendant,

**ONEASHA STEVENSON,**

in a matter affecting interstate commerce, did knowingly and with intent to defraud use, and attempt to use, unauthorized access devices, that is: a fraudulently obtained credit account number using the identity of D.T. with an aggregate value exceeding \$1,000.00, that being \$2,277.88.

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

**COUNT 8**

(Access Device Fraud)

On or about December 10, 2022, within the Eastern District of Missouri, the defendant,

**ONEASHA STEVENSON,**

in a matter affecting interstate commerce, did knowingly and with intent to defraud use, and attempt to use, unauthorized access devices, that is: a fraudulently obtained credit account number using the identity of D.T. with an aggregate value exceeding \$1,000.00, that being \$1,306.77.

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

**COUNT 9**

(Identity Theft)

On or about January 5, 2023, in the Eastern District of Missouri, the defendants,

**ONEASHA STEVENSON,**

did knowingly possess, transfer, and use, without lawful authority, the means of identification of another person, to wit, the name and date of birth of D.T., with the intent to commit, and in connection with, the commission of the crime of forgery in violation of Missouri Revised Statutes 570.090, at Clement Auto, knowing that the means of identification belonged to an actual person.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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TRACY L. BERRY, 014753 TN  
Assistant United States Attorney